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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JASON GOODMAN,
Plaintiff,

v.

ANDREW SAUL, COMMISSIONER, SSA
THOMAS ENGLISH, ALJ
SCOTT KARGOL, DIRECTOR
GEORGE FRANJEVIC, GS

CIVIL NO. 1:19 - cv - 05787

JUDGE: JOHN J THARP JR.

MOTION FOR SUMMARY JUDGEMENT

I, Jason Goodman, declare as follows:

1. I was hired as an SCT at the Chicago ODAR hearing office in the Social Security Administration (Agency) in September 2014 via 10-point preference, Veterans Recruitment Appointment (VRA) for the Pre/Post Development Group A under Group Supervisor Meagan Paulas who later left the agency then GS Januasitis and later GS Richard by Director Scott Kargol. Out of the 9 plus new hires, I was requested by management to also assist in the Scheduling Group C under first-line supervisor George Franjevic towards the end of October 2014 due to an existing Group C extensive case backlog, Group C short staffing and due to government shutdown hiring freeze as, Kargol indicated I seemed to be acclimating faster during orientation than other new hires and that the Group A formal NHT had been pushed back. Franjevic introduces himself to me and states, "They needed you here".

2. Sept 2014- July 2015 I was the only NHT employee SCT in the Chicago ODAR office to not be issued HSPD card credential or transit subsidy voucher. I was the only new hire Pre/Post Group A to be temporarily assigned to assist under another GS Franjevic – Group C in addition to my Group A orientation, informal training, OJT, agency-wide training and duties under my Supervisors GS Paulas, later GS Januasitis and then GS Richard in Group A. I was the only new hire or non-probationary employee, assigned orientation, OJT, workloads, informal training, NHT formal training from two different work groups simultaneously under two different Group Supervisors.
3. Under Pre/Post Group A, GS Paulas, GS Januasitis & GS Richard, I was responsible for OJT, Pre-Hearing Conferences a Pilot Program for ALJ's, trainings, orientation, side by sides, Front-Desk duties, Reception, formal NHT, Discs for hearings, Interrogatories, Queries, Case Closing, Case Pulling and various other duties too numerous to list. My Pre/Post Group A supervisors regularly approved my leave requests and assigned my trainings and provided my duties. Ex. E, S & T.
4. Approximately Nov 2014 Group C - LCT Adams assigned as my Group C mentor by Franjevic and Group C scheduler CT Allison, on two different occasions, pulled me aside and cautioned me to watch my back with Franjevic and that he comes after new m/b hires. These interactions troubled me greatly and caused a sense of fear, intimidation and emotional stress despite knowing Kargol merely was temporarily having me assist Group C. However, unaware at this time that he was intentionally and maliciously allowing Franjevic to

egregiously and adversely hijack my performance and employment status from Group A to Group C effectuating a disparately wrongful discharge.

5. Throughout assisting Group C, Franjevic frequently criticized me when I had to leave to office for scheduled medical appointments accusing me of getting out of doing work. Mar 2015, I was admitted to Hines VA hospital for suicidal stress, paranoia and psychotic episodes due to my work environment at Chicago ODAR. Franjevic scolds me that he had to reassign my work while I was hospitalized and that I merely suffered from HBP. Ex R.
6. Franjevic, while standing over my shoulder made harassing, inappropriate, intimidating comments regarding bible verses posted in my work cubicle “You don’t expect those bible verses to help you, do you? I’m already living in hell and the Lord doesn’t have my back.”
7. Nov 2014 Franjevic assigned me full 3 and 2 ALJ scheduling caseload even more than tenured schedulers and stated he would use and abuse me up in scheduling meetings before I was to be required to no longer assist his Group C to the Pre/Post group with my fellow new hires this caused me further anxiety, emotional stress and unwelcomed in his Group.
8. Oct 2014 – July 2015 Franjevic unacknowledged and/or penalized me for my excellent performance completing assigned Group A responsibilities, training and duties but rather, overloaded me with Group C scheduling responsibilities I had no or minimal training on, evaluated me for tasks I had not yet been trained on, allowed no mission effective & efficiency teamwork within Group C, rejected requested assistance, work schedule curtailment and reasonable accommodation and evaluated me on a workload and training that no other employee was subjected to violating the NHT policy, rights, procedures and privileges.

9. Mar 2015, I completed mission critical 'work directive' of scheduling backlogged Priority, Dire Need and Aged Cases and received no recognition from Franjevic. Franjevic continued to add more Aged Cases to effectuate a failure to schedule mission critical Aged Cases.
10. Approximately April 2015 Franjevic texted me to my personal cellphone an offensive image; a cat in a boxing ring with the text 'bring it on' after issuing an unfair no rating 6 months PACS evaluation, used to terminate my employment. Franjevic must have had overheard me in a conversation I was having with another office colleague while on break, that I used to be a boxer. This unprofessional, unprompted, unwarranted and unwanted text persisted severe distress, more intimidation, endangerment and confrontation caused me again to notify Kargol. Ex N.
11. Jan 2014 – June 2015 I notified Kargol of Franjevic's marked wrongful unexcused absence, harassment, intimidation, unfair evaluation, workload and training. Kargol's response was he would remove Franjevic's weather advisory absence from my record and that Franjevic fault finds and nitpicks you and fails to recognize your positive contributions and that he himself has to put up with Franjevic. Kargol never corrects Franjevic's attendance claim, never addresses my request to be relinquish my assistance under Group C and slates me in the office directory from under Group A to Franjevic's Group C (Ex Q). Kargol further never investigated my complaints of Franjevic malicious response "I don't know what's wrong with you, that's above my pay grade" turning his back on me and walking away laughing when I was presented him with the verbal reasonable accommodation request in April. In May 2015, Kargol issues me a Certificate of Appreciation from Patrick Nagel HOCALJ in May 2015. Ex. L.

12. Dec 2014-May 2015 I submitted complex eBP, DGS, Dart, eView, CPMS databases & Telework ideas to improve upon the Agency's service to the public that were recognized by SSA headquarters in Baltimore, MD. I was conference-called by HQ's Grandy & Schulman for job well done and that my ideas would be submitted for review and I would be hearing back from their team in the future. Franjevic exclaims he too submitted ideas in the past relating to the PACS rating system but the Agency had stolen his ideas.
13. June 2015 While HOCALJ Nagle was out of the office on a Leadership sabbatical, Franjevic & Kargol went on vacation intentionally conspiring with newly arrived Acting HOCALJ Thomas English to issue me Notice of Termination. Thomas English, ALJ who had no firsthand knowledge of my performance. Thomas English provided me the false impression my Vision 2025 recognized idea submissions caused me to not focus on my Group C workloads which lead to my employment being terminated July 2015.
14. June - July 2015 Kargol places me on paid administrative leave prior to termination. Kargol states he would give me a positive recommendation despite being terminated but, I can no longer return to the Chicago ODAR office and my belongings would be mailed to me. Kargol confiscated workloads, ignored written reasonable accommodation request and other personal effects. My personal belongings that he should have mailed, were never mailed to me. Kargol also requests me to mail the agency my transit vouchers, agency access and keys although Kargol knew such articles were never issued or were in fact already in his custody.
15. Jan 2015 to present, I have undergone severe mental, emotional and physical stress and anguish in providing for myself and support care for my first child born 1/16/16 had to have medications changed, undergo Psychosocial Recovery treatment at Hines VA medical center to manage this traumatic hardship. Continue to suffer embarrassment and hardship within

friend and family relationships. I continue to experience exacerbated symptoms of my conditions particularly in workplace settings. Ex R.

16. I dispute any and all defendants' termination, evaluations, performance issues and the like.

Defendants' fabrications, mischaracterizations or outright lies as documented of my behavior and workplace performance by the Agency, English, Franjevic and Kargol. Due to fraud, waste and abuse of plaintiff, plaintiff requests money damages hereto described in complaint item 16 (g) to make plaintiff whole in 30 days as, defendants also defaulted defense during the exhaustion of administrative process. As for Claims violated; Title VII, ADA, Rehabilitation Act, Civil Rights, Reprisal, Retaliation, Whistleblower, Harassment, Hostile Work Environment, Discrimination.

A handwritten signature in black ink, appearing to read "Jason Goodman", is written over a horizontal dashed line. To the right of the signature, the date "9/4/19" is handwritten.

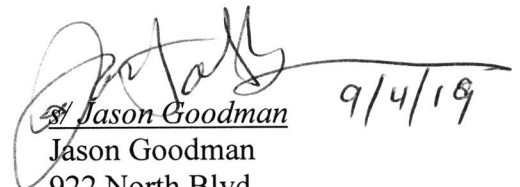
JASON GOODMAN

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CERFITICATE OF SERVICE

I, the undersigned, hereby certify that on 9/4/2019, I served the foregoing document(s) to the Clerk of the Court below for service to defendant(s) counsel with signature below:

The General Counsel
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